

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

WILLIAM MEADOWS AND JEANIE
MEADOWS,

Plaintiffs,

vs.

THE MEGA LIFE AND HEALTH
INSURANCE COMPANY, AND ITS
AGENT, MICHAEL JOSHUA MILFORD,
ET AL.,

Defendants.

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CASE NO. 1:05cv1091-F

AMENDED JOINT REPORT OF PARTIES' PLANNING MEETING

On January 4, 2006, the parties filed their Joint Report of Parties' Planning Meeting. In that Report, the parties inadvertently requested a conference with the court before entry of the scheduling order. The parties hereby present this Amended Joint Report of Parties' Planning Meeting, wherein paragraph 4.a. has been amended to reflect the parties' agreement not to request a conference with the court before entry of the scheduling order.

1. Pursuant to Federal Rule of Civil Procedure 26(f), a meeting of the parties was held on January 3, 2006 and participating therein were Gary D. Bradshaw, Esq. for Plaintiffs and Pamela A. Moore, Esq. for Defendants.¹

2. Pre-Discovery Disclosures. The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) by January 31, 2006.

¹ Counsel for Defendant The MEGA Life and Health Insurance Company is also counsel of record for Defendant Michael Joshua Milford and does not waive and specifically reserves the arguments outlined in Mr. Milford's pending motion to dismiss.

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be needed on the following subjects: the legal claims and damages raised in Plaintiffs' Complaint as well as the issues raised in Defendants' responses to the Complaint.
- b. All discovery commenced in time to be completed by August 14, 2006.
- c. Maximum of 30 interrogatories and requests for production, including sub-parts, by each party to any other party. Responses are due 30 days after service.
- d. Maximum of 30 requests for admission, including sub-parts, by each party to another party. Responses are due 30 days after service.
- e. Maximum of 10 depositions by Plaintiffs and 10 depositions by Defendants.
- f. Each deposition shall be limited to a maximum of 7 hours unless extended by agreement of the parties.
- g. Reports from retained experts under Rule 26(a)(2) due:
 - (1) From Plaintiffs by: June 1, 2006.
 - (2) From Defendants by: July 1, 2006.
- h. Supplementations under Rule 26(e) due: August 14, 2006.

4. Other Items:

- a. The parties do not request a conference with the court before entry of the scheduling order.
- b. The parties request a pretrial conference in September 2006.
- c. Parties should be allowed until March 20, 2006 to join additional parties and to amend the pleadings.
- d. All potentially dispositive motions should be filed by no later than 90 days prior to the pretrial date (per this Court's Rule 26(f) Order)
- e. Settlement is possible and may be enhanced by mediation.

- f. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
 - (1) From Plaintiffs by 30 days before trial;
 - (2) From Defendants by 30 days before trial.
- g. Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- h. The case should be ready for trial by October 2006, and at this time is expected to take approximately three to four days.
- i. Other matters.

Date: January 5, 2006.

This is e-signed by agreement of all parties.

/s/ Gary D. Bradshaw

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